



**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE**

NIKKI BOLLINGER GRAE, Individually and )	Civil Action No. 3:16-cv-02267
on Behalf of All Others Similarly Situated, )	)
Plaintiff, )	Judge Aleta A. Trauger
vs. )	)
) )	Magistrate Judge Jeffery Frensley
CORRECTIONS CORPORATION OF )	)
AMERICA, et al., )	)
Defendants. )	)
) )	)

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**DEFENDANTS' MOTION FOR LEAVE TO FILE UNDER SEAL CERTAIN  
PRIVILEGED AND CONFIDENTIAL DOCUMENTS IN CONNECTION WITH THEIR  
OPPOSITION TO PLAINTIFFS' MOTION TO COMPEL**

Pursuant to Local Rule 5.03 and the Revised Stipulation and Protective Order entered in this case (Dkt. No. 86) (the “Protective Order”), Defendants respectfully request that the Court grant Defendants leave to file under seal twelve exhibits to their Opposition to Plaintiffs’ Motion to Compel Production (the “Motion to Compel”) (Dkt. No. 194). The documents Defendants seek to file under sealed contain (i) privileged or attorney work product information and/or (ii) non-public information that Defendants have designated as “CONFIDENTIAL” pursuant to the Protective Order. Such confidential and proprietary information concerns the business strategies and operations of CoreCivic, Inc., formerly known as Corrections Corporation of America, Inc. (the “Company”), which if made public, could harm the Company’s competitive standing.